

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

280 MEEKER LLC,)	
)	
Plaintiff,)	CIVIL ACTION NO. 1:23-cv-00148-PAE
)	
v.)	
)	
)	
UMB BANK, N.A., as Trustee)	
)	
Defendant.)	
_____)	

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Plaintiff 280 Meeker LLC and Defendant UMB Bank, N.A., as Trustee, pursuant to Fed. R. Civ. Pro. 26(c), jointly move this Court for entry of the Stipulated Protective Order (“Protective Order”) attached to this motion. In support, the parties state as follows:

1. Discovery in this action has commenced pursuant to the Civil Case Management Plan and Scheduling Order. On May 1, 2023, the parties served discovery requests on each other, seeking the production of documents that include documents that each party contends contain confidential and proprietary business, technical, commercial or financial information subject to protection under Fed. R. Civ. P. 26(c). Similarly, confidential documents and information may be present in discovery sought from third parties. The parties agree that entry of a protective order is appropriate to protect against unauthorized disclosure of such confidential and proprietary information.

2. The parties have agreed to the terms of the stipulated protective order attached this motion, and agree that entry of this order will (1) adequately protect any confidential and proprietary information sought in discovery; (2) expedite the flow of such discovery; and (3) facilitate the prompt resolution of disputes.

3. Under Fed. R. Civ. Pro. 26(c)(1)(G), the Court has the power to enter the attached stipulated protective order to protect against the unauthorized disclosure of confidential or proprietary information.

For these reasons, good cause exists for entry of a protective order and the parties respectfully request that the Court grant this motion and enter the stipulated protective order attached to this motion.

Dated: May 15, 2023
New York, New York

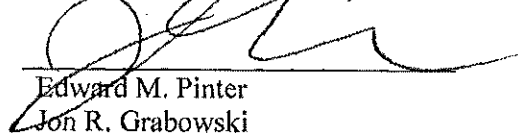
HUNTON ANDREWS KURTH LLP



Patrick L. Robson
200 Park Avenue, 52nd Floor
New York, New York 10166
Telephone: (212) 309-1000
probson@huntonAK.com

Attorney for Plaintiff 280 Meeker LLC


FORD MARRINESPOSITO
WITMEYER & GLESER, L.L.P.



Edward M. Pinter
Jon R. Grabowski
Zane D. Shephard
Wall Street Plaza, 16th Floor
New York, NY 10005
Telephone: (212) 269-4900
empinter@fmew.com
jrgrabowski@fmew.com
zshephard@fmew.com

*Attorneys for Defendant UMB
Bank, N.A., as Trustee*

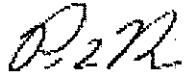
SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge
May 16, 2023

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2023, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to all parties on the electronic filing receipt. Parties may access this filing through the Court's system.



Patrick L. Robson